

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:)	Case No. 25-30002
)	(Chapter 11)
GENERATIONS ON 1ST, LLC)	
)	
Debtor)	
_____)	
)	
In re:)	Case No. 25-30003
)	(Chapter 11)
PARKSIDE PLACE, LLC)	
)	
Debtor)	
_____)	Jointly Administered

MOTION TO APPEAR VIA VIDEO CONFERENCE

Come now Generations on 1st, LLC (“Generations”) and Parkside Place, LLC (“Parkside”) (collectively, the “Debtors,” and each a “Debtor”), by and through undersigned counsel, pursuant to Local Rule 5001-2(B), and move to permit undersigned counsel to appear at the March 13, 2025 cash collateral hearing, in the above-referenced jointly administered cases, via video conference, and in support thereof state as follows:

Late yesterday afternoon, the Debtors and Red River State Bank (“RRSB”) were able to reach an agreement concerning the forward-looking utilization of cash collateral. The agreement was shortly thereafter docketed herein, DE #69, with no objections having been filed to the underlying motion, DE #63, and with the United States Trustee having now affirmatively indicated a lack of objection to the underlying motion, DE #71.

Based on the foregoing, it is not believed the hearing in this matter will be contested in nature or is likely to require an evidentiary presentation. In the interests of economy and efficiency, after the aforementioned stipulation was executed, and knowing an evidentiary hearing was no

longer a likelihood, undersigned counsel cancelled his airfare from Washington, DC to Minneapolis and, instead, boarded an early flight home to Maine.¹

WHEREFORE, the Debtors pray this Honorable Court (i) permit their counsel to appear at the March 13, 2025 hearing herein via video conference; and (ii) afford such other and further relief as may be just and proper.

Respectfully Submitted,

Dated: March 13, 2025

By: /s/ Maurice B. VerStandig
Maurice B. VerStandig, Esq.
The Dakota Bankruptcy Firm
1630 1st Avenue N
Suite B PMB 24
Fargo, North Dakota 58102-4246
Phone: (701) 394-3215
mac@dakotabankruptcy.com
Counsel for the Debtor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of March, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig
Maurice B. VerStandig

¹ The United States Trustee's position on the motion was *not* known at the time, though the Debtors fairly surmised it would be unusual for that office to object to a stipulated resolution.